

**EXHIBIT 95**  
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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: FACEBOOK, INC., MDL No. 2843  
CONSUMER USER PROFILE Case No.  
LITIGATION 18-md-02843-VC-JSC

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This document relates to:  
ALL ACTIONS

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ZOOM DEPOSITION OF FACEBOOK's 30(b)(6)  
CORPORATE REPRESENTATIVE - MICHAEL DUFFEY  
(Reported Remotely via Video & Web Videoconference)  
Palo Alto, California (Deponent's location)  
Wednesday, June 2, 2022  
Volume I

STENOGRAPHICALLY REPORTED BY:  
REBECCA L. ROMANO, RPR, CSR, CCR  
California CSR No. 12546  
Nevada CCR No. 827  
Oregon CSR No. 20-0466  
Washington CCR No. 3491  
JOB NO. 5234611  
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DEPOSITION OF MICHAEL DUFFEY, taken on  
behalf of the Plaintiffs, with the deponent located  
in Palo Alto, California, commencing at  
9:14 a.m., Wednesday, June 3, 2022, remotely  
reported via Video & Web videoconference before  
REBECCA L. ROMANO, a Certified Shorthand Reporter,  
Certified Court Reporter, Registered Professional  
Reporter.

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(All parties appearing via Web videoconference)

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APPEARANCES (cont'd)

(All parties appearing via Web videoconference)

ALSO PRESENT:

Ian Chen, Associate General Counsel,  
Meta Platforms

John Macdonell, Videographer

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[illegible]

10:05:06

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A. That -- that team is -- is -- receives  
subpoenas and requests from law enforcement  
regarding individual users at Facebook.

10:05:31

10	And, Mr. Duffey, again, I'll just caution	10:05:49
11	you: Don't reveal any privileged communications	
12	you may have had in the course of your work at the	
13	company in answering that question.	

14

10:07:07

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

20 MR. FALCONER: Objection. Beyond the

10:08:42

21 scope of the notice.

22 [REDACTED]

23 Q. (By Ms. Weaver) Who would know?

24 MR. FALCONER: Same objection.

25 THE DEPONENT: Somebody -- somebody on

10:09:03

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

17

Q. And when you say "groups," what do you

18

mean?

19

A. Facebook groups.

20

Q. And can you state for the record what

10:47:44

21

Facebook groups are?

22

A. Sure. I'm sorry.

23

Q. No problem.

24

A. A group is -- how would I -- if you have

25

an interest in a specific topic, for instance,

10:48:05

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7                   So that is the -- a way to interact  
8     outside of your network of -- of friends.

[illegible]

L7

[REDACTED]

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Q. And do you see on page -3258 you've got a heading "Facebook can remove objects and associations," and then there's a bullet point that says "Facebook deprecates products and features, and objects and associations would be deleted when this happens"?

11:03:28

Do you see that?

11:03:51

A. Yes.

Q. What does "deprecate" mean, for the record?

A. No longer available for use.

11:04:05

11:04:46

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